

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ALICE D. HILL, *on behalf of herself and all*
similarly situated individuals,

Plaintiff,

vs.

Civil Action No. 1:12-cv-671-JCC-JFA

CHADWICK, WASHINGTON, MORIARTY,
ELMORE & BUNN, P.C.,

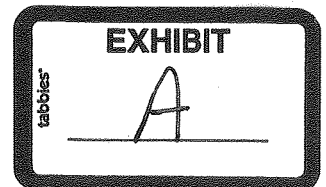
Defendant.

OFFER OF JUDGMENT

Chadwick, Washington, Moriarty, Elmore & Bunn, P.C. ("Defendant"), by counsel, pursuant to Rule 68 of the Federal Rules of Civil Procedure (the "Rules"), hereby offers to allow judgment to be taken against it in this action and in favor of the plaintiff, Alice D. Hill ("Plaintiff"), on all counts asserted against Defendant in Plaintiff's Complaint in this matter (whether individual or collective, dismissed or pending, and whether or not appeal is available or pending) in the following amounts:

- (1) Actual damages in the amount of \$2,000.00;
- (2) Statutory damages in the amount of \$1,001.00;
- (3) Costs of this action accrued to date; and
- (4) A reasonable attorney's fee to date as determined by the Court.

Accordingly, acceptance of this offer shall have the effect of precluding all further litigation by Plaintiff of any claim arising from, or related to, the allegations in the Complaint.



This Offer of Judgment is made only for the purposes specified in Rule 68 and shall not be construed as an admission of liability, wrongdoing, or responsibility for damages. Defendant expressly denies liability or any other wrongdoing.

If written notice accepting this offer is not served on the undersigned within fourteen (14) days of the date of service of this Offer of Judgment, this Offer of Judgment will be considered withdrawn.

Please take notice that if you choose not to accept this offer, and the judgment that you finally obtain is not more favorable than this offer then, pursuant to Rule 68(d), you must pay the costs incurred after this offer was made.

Dated: September 21, 2012

Respectfully submitted,

CHADWICK, WASHINGTON, MORIARTY,
ELMORE & BUNN, P.C.

By: 

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